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Via electronic filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex parte* notice – *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Difficulties*, CG Docket No. 03-123

Dear Ms. Dortch:

As a person with a disability who is friends with other individuals with speech and communication disabilities, I am writing to you with my concerns about Speech-to-Speech service quality and important outreach issues. It is my understanding that the Commission is considering adopting the “MARS Plan” for setting interstate rates for various forms of TRS, including Speech-to-Speech (“STS”) service. I wish to address my concerns about the MARS plan, and I am in support of it as long as the following criteria are met:

The MARS plan shall insure the STS NECA rate reimburses providers for all costs for providing STS. That is, providers must have the economic incentive to ensure that every person with a speech disability who can use STS in the U.S. is supplied information on how to do so, just as all members of the American public have received information on how to use POTS.

The Communications Act Section 225 requires the Commission to ensure that the various forms of interstate relay service are “functionally equivalent” to traditional phone service. Furthermore, the FCC has recognized, the need to achieve functional equivalency is particularly urgent for “people with severe speech disabilities, an insular community that has been, for the most part, denied access to the telephone network.”^[1] As a result, the Commission has wisely established STS as a form of TRS to meet the growing need. Yet, the Commission has failed to follow through on its commitment to ensure persons with speech disabilities have adequate access to information about this service. There is little economic incentive for providers to do STS Outreach because STS

^[1] 15 FCC Rcd 5140. That same order also explains that “STS will help break the insularity barriers that confine members of the community of people with speech disabilities and offer them opportunities for education, employment, and other, more intangible benefits (freedom, joy, self-reliance) that are concomitant with independence

is provided as part of a package deal where other services generate higher rate reimbursements and STS is provided as part of this package below cost.

As a result of low STS rate reimbursements to providers based on the decision on June 29th by the FCC to freeze the interstate rate for STS at \$1.409 per minute (this rate is much lower than the various compensation rates proposed this year by NECA which recommended for the 2007-08 rate year using various methodologies for setting the STS rate anywhere from \$2.49 to \$3.45), providers cannot offer functionally equivalent STS when they are denied the opportunity to recover their costs. Additionally, providers cannot conduct the substantial outreach that is needed to educate the public, including informing the thousands of speech-disabled U.S. residents who are presently unaware of the availability of Speech-To-Speech (STS) telecommunications services.

Reimbursement rates for STS need to be increased to give providers the incentive to do outreach to the potential STS community who lack a voice to advocate for STS services. Therefore, the MARS Plan must establish an STS rate that ensures providers' have the economic incentive to conduct outreach to effectively reach and educate consumers with speech disabilities about STS relay services. This means the interstate STS rate must match or exceed the providers' estimated costs. Without adequate funding by the Commission to providers, the speech-disabled community will remain underserved and without equal access to telecommunications as members of the general public. Low rate reimbursements to STS providers reduce access by persons with speech disabilities by reducing critical outreach education programs and decreasing service quality. Please support the independence and equal access to telecommunications providers for STS consumers by ensuring that the MARS Plan pays STS providers for the actual cost of doing business and serving the needs of this population to the fullest on a scale that insures outreach and the rights of persons with speech disabilities are not abridged.

Pursuant to the Commission's rules, this letter is being submitted for inclusion in the public record of the above-captioned proceeding.

Respectfully,

Connie Arnold
Disability Policy Consultant